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RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DECLARATION OF ROBERT H.
RECKERS IN SUPPORT OF
DEFENDANT RIMINI STREET INC.'S
OPPOSITION TO ORACLE'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

Date:

Time:

Place:

Judge: Hon. Larry R. Hicks

DECLARATION OF ROBERT H. RECKERS

I, Robert H. Reckers, have personal knowledge of the facts stated below and, under penalty of perjury, hereby declare:

1. I am an attorney admitted to practice *pro hac vice* before this Court in the above captioned matter, and an attorney at Shook, Hardy, and Bacon LLP, attorneys for Defendant Rimini Street, Inc., (“Defendant”). I make this declaration in support of Defendant’s Opposition to Oracle’s Motion for Partial Summary Judgment filed on April 28, 2012. The Exhibits referenced below are all attached to the Appendix of Exhibits Cited In Support of Rimini’s Opposition to Oracle’s Motion for Partial Summary Judgment. These Exhibits are all true and correct copies of page and excerpts from final deposition transcripts, or from exhibits used in depositions, or from documents produced by the parties or a third party, or from written discovery exchanged between the parties. To minimize bulk, for ease of use, and to the extent possible without losing context, only the relevant pages and information are included in these Exhibits.

2. Attached to the Appendix as **Exhibit 1** is a true and accurate copy of relevant excerpts of the transcript of the December 14, 2011 deposition of Safra Catz.

3. Attached to the Appendix as **Exhibit 2** is a true and accurate copy of relevant excerpts of the transcript of the December 9, 2011 deposition of Charles Phillips.

4. Attached to the Appendix as **Exhibit 3** is a true and accurate copy of relevant excerpts of the transcript of the December 1, 2011 deposition of Paul Simmons.

5. Attached to the Appendix as **Exhibit 4** is a true and accurate copy of relevant excerpts of Rimini’s Deposition Exhibit 3, which was introduced during the December 1, 2011 deposition of Paul Simmons.

6. Attached to the Appendix as **Exhibit 5** is a true and accurate copy of relevant excerpts from the Expert Report of Randall Davis served by Oracle on February 2012.

7. Attached to the Appendix as **Exhibit 6** is a true and accurate copy of relevant excerpts of the transcript of the June 8, 2011 deposition of Ray C. Grigsby.

8. Attached to the Appendix as **Exhibit 7** is a true and accurate copy of relevant excerpts of the transcript of the March 17, 2011 deposition of Beth Lester.

9. Attached to the Appendix as **Exhibit 8** is a true and accurate copy of relevant excerpts of the transcript of the November 11, 2011 deposition of George Lester.

10. Attached to the Appendix as **Exhibit 9** is a true and accurate copy of Oracle's Deposition Exhibit 758, which was introduced during the November 7, 2011 deposition of Thomas O'Brien.

11. Attached to the Appendix as **Exhibit 10** is a true and accurate copy of relevant excerpts of the transcript of the December 16, 2011 deposition of Brian Slepko.

12. Attached to the Appendix as **Exhibit 11** is a true and accurate copy of relevant excerpts of the transcript of the August 24, 2010 deposition of Brian Slepko.

13. Attached to the Appendix as **Exhibit 12** is a true and accurate copy of relevant excerpts of the transcript of the December 15, 2011 deposition of Brian Slepko.

14. Attached to the Appendix as **Exhibit 13** is a true and accurate copy of relevant excerpts of the transcript of the September 16, 2011 deposition of Douglas Zorn.

15. Attached to the Appendix as **Exhibit 14** is a true and accurate copy of relevant excerpts of Oracle's [Corrected] Supplemental and Amended Responses to Rimini Street's First Set of Interrogatories (No. 1-12). The excerpt includes Oracle's Response to Rimini's Interrogatory No. 9.

16. Attached to the Appendix as **Exhibit 15** is a true and accurate copy of Oracle's First Amended Response to Rimini Street's Interrogatory No. 26.

17. Attached to the Appendix as **Exhibit 16** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0004151-55.

18. Attached to the Appendix as **Exhibit 17** is a true and accurate copy of relevant excerpts of a document produced by Oracle in this matter, Bates number ORCLRS0018170-340.

19. Attached to the Appendix as **Exhibit 18** is a true and accurate copy of relevant excerpts of a document produced by Oracle in this matter, Bates number ORCLRS0053129-48.

20. Attached to the Appendix as **Exhibit 19** is a true and accurate copy of relevant excerpts of a document produced by Oracle in this matter, Bates number ORCLRS0055893-964.

21. Attached to the Appendix as **Exhibit 20** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0144955-56.

22. Attached to the Appendix as **Exhibit 21** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0260580-83.

23. Attached to the Appendix as **Exhibit 22** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0518901.

24. Attached to the Appendix as **Exhibit 23** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0611787-88.

25. Attached to the Appendix as **Exhibit 24** is a true and accurate copy of relevant excerpts of a document produced by Oracle in this matter, Bates number ORCLRS0811822-44.

26. Attached to the Appendix as **Exhibit 25** is a true and accurate copy relevant excerpts of a document produced by Oracle in this matter, Bates number ORCLRS0811845-58.

27. Attached to the Appendix as **Exhibit 26** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0811859-65.

28. Attached to the Appendix as **Exhibit 27** is a true and accurate copy of a document produced by Oracle in this matter, Bates number ORCLRS0811866-72.

29. Attached to the Appendix as **Exhibit 28** is a true and accurate copy of relevant excerpts of a document produced by Oracle in this matter, Bates number ORCLRS0811873-99.

30. Attached to the Appendix as **Exhibit 29** is a true and accurate copy of a document produced by Rimini Street in this matter, Bates number RSI00002747-59.

31. Attached to the Appendix as **Exhibit 30** is a true and accurate copy of a document produced by Rimini Street in this matter, Bates number RSI03016354-66.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 27, 2012

/s/ Robert H. Reckers
Robert H. Reckers, Esq.